

Exhibit 11

2719 - Susman Godfrey, LLP

1 - US Ex Rel v Boston Scientific, et als

Timekeepers' Hours, Years in Practice, Hourly Rates & Role

GWM - Grant W. McGuire - 1,007.50 hours - 24 years practicing - \$400.00 hourly rate - Partner

KST - Kelly S. Thomas - 2.60 hours - 10 years practicing - \$150.00 hourly rate - Associate

Date	Tmkpr Initials	Hours	Rate	Fees	Description
12/01/15	GWM	0.60	400.00	240.00	Communications with MP re: potential representation of BC on criminal/traffic issue - municipal court;
12/08/15	GWM	4.60	400.00	1,840.00	Ongoing review of docket re: Ex Rel matter where TMW&B will serve as local counsel with SG - analysis of what BR materials successor counsel will be allowed to review and which materials should be avoided/quarantined;
12/08/15	GWM	1.30	400.00	520.00	Review of draft letter to MCA and communications re: same (.80); attended to filing letter with MCA (.50);
12/09/15	GWM	5.50	400.00	2,200.00	Reviewed docket and internet re: nature of case;
12/10/15	GWM	2.20	400.00	880.00	Receipt and review defendants submission to court re: opposition to communications with BR (.70); communications with counsel at SG and analysis of substance and manner of response (1.50);
12/15/15	GWM	0.30	400.00	120.00	Communications with AS re: application to MCA re: accessibility to BR file;
12/18/15	GWM	4.50	400.00	1,800.00	On-going review of Bahnsen Docket and research re: understanding of underlying factual issues;
12/21/15	GWM	2.40	400.00	960.00	Communications with AS and Court re: call/conference re: Blank Rome issue (weekend) (.60); prep/analysis re: issues associated with review of BR file (1.80);
12/22/15	GWM	2.90	400.00	1,160.00	Review of complaints; answers and motions including protective order (2.30); communications with SG re: Pacer entries (.60);
12/23/15	GWM	4.60	400.00	1,840.00	Prep for 12/30 conference with court - review of pleadings and supporting materials on PACER;
12/28/15	GWM	1.00	400.00	400.00	Prep for 12/30 conference call with court on issue of what communications we may have with predecessor counsel (BR) in light of Court's 11/30/15 order DQing BR on conflict;
12/28/15	GWM	0.60	400.00	240.00	Communications 1/24 - 1/27 among counsel re: 12/30 conference;
12/29/15	GWM	3.00	400.00	1,200.00	Reviewed complaint/other pleadings in advance of conference with court on 12/30;
12/29/15	GWM	1.00	400.00	400.00	Background RS on Felice B. Galant (defense counsel);
12/30/15	GWM	3.10	400.00	1,240.00	Communications with AS; RS and FG including (evening calls/e-mails) in advance of conference with Court (2.0); conference with court re: BR issues and representation remains prospective (.50); post conference communications with AS and RS (.60);
01/04/16	GWM	3.30	400.00	1,320.00	Prep for conf call with trial team (.70); conference call with trial team (.50); prep notice of appearance (.20); filed notice of appearance (.20); call w/opposing counsel (.30); e-mails re: days business (1.40);
01/04/16	GWM	2.20	400.00	880.00	Reviewed docket re: procedural status and pleadings;
01/04/16	GWM	0.50	400.00	200.00	Attended to protective order and compliance re: same;
01/05/16	GWM	4.80	400.00	1,920.00	Reviewed key docket entries in advance of 1/11/16 conference with court re: status - protective order, complaint, CMO's and prior motions to compel;
01/06/16	GWM	2.00	400.00	800.00	Prep for call with BR and SG re: status of case (1.40); call with BR and SG (.60);
01/06/16	GWM	0.60	400.00	240.00	PHV e-mails;
01/07/16	GWM	0.80	400.00	320.00	E-mail from C. DaCosta and revised M. Gerra's Cert in Support of PHV motion (.20); Communications among Trial Team and clients re: BR discovery (.60);

01/08/16	GWM	6.60	400.00	2,640.00	Communications re: PHV; deal/agreement with defense counsel re: materials from Blank Rome which TMW&B/SG may receive/review and initial review of same;
01/08/16	GWM	1.20	400.00	480.00	Prep for 1/11/16 Conference with MJ Wettre re: discovery;
01/11/16	GWM	1.50	400.00	600.00	Prep for 10 a.m. conference call with counsel and court (.60); pre-conference communications with counsel (.30); conference call with counsel and MJ Wettre (.60);
01/11/16	GWM	5.50	400.00	2,200.00	On-going review of Bos Sci discovery as provided by Blank Rome and organization of same (4.30); post conference communications/e-mail with counsel and clients (1.20);
01/12/16	GWM	5.50	400.00	2,200.00	Reviewed JP dep transcript and plaintiff's rogs and defendant's rogs;
01/12/16	GWM	0.20	400.00	80.00	Communications re: BR discovery and transfer re: same;
01/13/16	GWM	8.00	400.00	3,200.00	Completed review of WB and CF dep transcripts and notes re: same (4.80); e-mails re: management of discovery and experts (1.10); attended to Substitution of Attorney form and filed same (1.0); attended to PHV applications and filed same (1.10);
01/14/16	GWM	7.20	400.00	2,880.00	Communications re: Rebecca Bush (expert previously engaged by BR) and materials associated with RB's work (1.10); receipt and review e-mail re: weekly conference call and task list re: same (.60); communications with Brattle group (ESI consultants) (.40); conference call with trial team (.50); reviewed discovery in prep for call with RB (4.60);
01/15/16	GWM	6.40	400.00	2,560.00	Communications with defense counsel re: met and confer (.30); initial review of priv logs as prepared by BR and Bahnsen/Fuentes and issues identified in correspondence re: same (3.30); prep for conference call with Court/meet and confer re: discovery disputes (2.80);
01/18/16	GWM	3.60	400.00	1,440.00	Reviewed SG work product re: summary of discovery thus far digested and summaries of CF; WB and JP depositions;
01/19/16	GWM	3.30	400.00	1,320.00	Conference call with SG team in prep for call with defense counsel on discovery issues (.50); call with defense counsel on discovery issues (.60); e-mails re: BR proofs as to legitimate discovery disputes/deficiencies on part of defense counsel (.80); communications re: 3rd party vendor (Brattles) efforts (.60); e-mails re: AUSA insights/positions (.40); communications re: 3rd party discovery/former employees whom may be friendly/helpful (.40);
01/19/16	GWM	1.30	400.00	520.00	Reviewed docket re: rulings as to discovery issues and case management in prep for 1/22 deadline to submit joint letter to MJ Wettre as to status of discovery;
01/20/16	GWM	7.90	400.00	3,160.00	Communications and review of JC's PHV application (.60); communications and review of damages documents in prep for conference call with R.B. (2.90); conference call with Trial team and R.B. on damages and proofs re: same (1.40);
01/20/16	GWM	7.90	400.00	3,160.00	Communications with counsel re: 1/21/16 conference call with defense counsel on discovery status and prep for same (1.60); e-mails re: additional fact witnesses: R. Nossa; A. Pierce and R. Garcia and review of dep transcripts re: relevance (1.40);
01/21/16	GWM	7.20	400.00	2,880.00	Prep for call with counsel for defendants re: discovery issues (2.20); call with defense counsel (.50); review/revisions to draft letter to MJ Wettre (2.0); analysis of documents/discovery re: damages (2.0); communications with BR counsel re: damages documents (.50);
01/22/16	GWM	8.10	400.00	3,240.00	E-mails and phone communications in prep for filing joint discovery status letter with Court (3.4); reviewed various drafts and exhibits to draft letter (2.4); review/analysis of underlying discovery and discovery disputes between predecessor counsel and defense counsel (1.60); filed letter with MJ Wettre (.20); attended to/filed J. Connors PHV application (.50);
01/22/16	GWM	0.50	400.00	200.00	Reviewed "new" interrogatory to be served on defense counsel;

01/25/16	GWM	7.10	400.00	2,840.00	Prep for conference with counsel and MJ Vette at 1:45 (2.50); Communications with trial team before/after conference with court (2.90); Conference with Court (.50); Receipt and review order granting JC's PHV admission and e-mail advising re: same (.20); reviewed info re: Web Extender data (1.0);
01/26/16	GWM	5.50	400.00	2,200.00	Privi log review/analysis (2.40); Notice re: clerks entry re: 1/25 conference (.10); analysis re: best manner to convince Judge Arleo that limited additional discovery is necessary and that defendants have not been entirely candid in terms of their description of chronology of discovery (3.0);
01/27/16	GWM	3.30	400.00	1,320.00	Prep for call with Judge Arleo re: discovery reviewed underlying disc (as available) and summaries of same - outlined gaps;
01/28/16	GWM	4.80	400.00	1,920.00	Communications re: task list, meeting with clients weekend of 1/30/16; review of BR work product, review of Laura DeAlmeida materials;
01/29/16	GWM	1.80	400.00	720.00	Communications with trial team (.20); ongoing review of damages documents in prep for call/conference with Arleo (.60);
02/01/16	GWM	2.70	400.00	1,080.00	Communications with trial team and review of initial written discovery;
02/02/16	GWM	2.20	400.00	880.00	PHV activity for JC, AS, et als (1.20); Receipt and review agenda for weekly call and prep for same (1.0);
02/03/16	GWM	3.00	400.00	1,200.00	Communications with counsel re: discovery issues to address with Court and review of discovery (and summaries thereof) re: missing pieces not provided by defendants;
02/04/16	GWM	4.50	400.00	1,800.00	AS e-mail to F.G. re: extract file as to Medicare claims 2007-09 and spreadsheet re: claims - analysis of same (1.30); e-mails re: priv log issues and review of summary and prep for conference with MAC re: same (1.0); receipt and review task list for 2/4/16 conference call and prep for same (.50); conference call with trial team (.50); e-mail re: R. Nossa 2/17/16 interview (.1); Receipt and review materials re: BS compliance with Medicare (1.10);
02/05/16	GWM	1.60	400.00	640.00	E-mails and analysis of priv log (19 separate logs) in context of ongoing disc dispute;
02/08/16	GWM	1.40	400.00	560.00	Communications among counsel re: priv. log issues;
02/08/16	GWM	0.40	400.00	160.00	E-mails re: sources of extract files;
02/10/16	GWM	2.00	400.00	800.00	Review of talking points/all discovery related issues in prep for presentation to Court;
02/11/16	GWM	1.70	400.00	680.00	Communications among counsel re: discovery issues (.40); Receipt and review task list (weekly) and prep for weekly conference call (.50); conference call with trial team (.50); post conference call with BC (.20);
02/12/16	GWM	3.00	400.00	1,200.00	Reviewed privilege log issues and BS various tactics at providing discovery in advance of filing letter with MCA and review of R. Nossa outline of questions;
02/16/16	GWM	3.60	400.00	1,440.00	Receipt and review BS Notices re: intent to serve subpoenas on National Heritage Insurance Company and Palmetto and attendant issues - communications with AP on said issues - review of discovery with respect to NHIC and Palmetto (2.20); Receipt and review draft letter to Arleo re: discovery and communications re: same/timing as to filing (1.40);
02/17/16	GWM	3.00	400.00	1,200.00	E-mails re: letter to Arleo; revisions and attached to filing letter and attachments (2.60); e-mails re: R. Nossa interview (.40);
02/18/16	GWM	0.60	400.00	240.00	E-mails re: R. Nossa interview and analyses re: same;
02/18/16	GWM	0.30	400.00	120.00	Receipt and review order from MJ Wettre scheduling in person conference on discovery issues for 2/26/16 and e-mails re: same;
02/18/16	GWM	1.10	400.00	440.00	E-mails re: agenda for conference call and prep for same (.50); conference call (.60);
02/18/16	GWM	0.20	400.00	80.00	E-mails with adversary counsel re: reschedule 2/26 conf with court;

02/19/16	GWM	3.60	400.00	1,440.00	Communications re: 2/26 conference with adversary counsel and SG (.60); letter from NR re: Noridian docs and NHSBSN 1-383 - communications re: same (1.10); reviewed 3rd party subpoenas and lists of documents requested within (1.0); review/analysis of M. Burns declaration (.40); e-mails re: final transfer of BR documents (.30);
02/22/16	GWM	2.70	400.00	1,080.00	Communications w/BR re: totality of file transfer and sources of information; reviewed e-mails re: Noridian data and data itself (2.60); letter from FG re: 2/26 hearing (.10);
02/22/16	GWM	4.20	400.00	1,680.00	Receipt and review defendants objections/response to list of discovery issues and prep for 2/26 conference;
02/23/16	GWM	2.50	400.00	1,000.00	E-mails discovery/attaching various discovery requests, disputes and potential resolutions;
02/24/16	GWM	3.30	400.00	1,320.00	Receipt and review amended 30(b)(6) dep notice to corp designee and topics of deposition (.70); communications/revisions to 30(b)(6) dep notice (.30); e-mails re: BR materials and gaps in review - Adrian Picard e-mails (.20); prep for 2/26 hearing and 2/24 conference with trial team (1.0); conference call with trial team e-mails re: hot docs and analysis re: same (1.10);
02/24/16	GWM	3.20	400.00	1,280.00	4/10/14 NR letter re: sampling and reliance of WebExtender (.60); reviewed agreement between NR and BR on 3% sample of WE; may be revisited upon showing of good cause - analysis re: best way to demonstrate good cause to revisit WE and physician orders - alternatively need to preclude NR from late production of POs or other wise making ref to POs we don't have (2.60);
02/24/16	GWM	0.60	400.00	240.00	Conference call with trial team re: 2/26 hearing;
02/25/16	GWM	8.60	400.00	3,440.00	Prep for 2/26 hearing before MJ Wettre; Review/analysis of Brattle data; Conference with trial team; Communications e-mails with trial team Pro Hac Vice for M. Musico;
02/26/16	GWM	6.40	400.00	2,560.00	Travel to/from court for conference with MJ Wettre (1.0); met with MM, AS and MG prior to hearing (.60); hearing before MJ Wettre and post hearing conference with opposing counsel (2.60); e-mails and review of Noridian subpoena (.20); post hearing calls/e-mails with trial team (2.0);
02/26/16	GWM	0.60	400.00	240.00	Late afternoon/evening emails re: change of focus for week 2/29;
02/29/16	GWM	4.50	400.00	1,800.00	Communications re: coding issues and potential experts (1.40); Communications re: strategy for moving discovery issues forward and potential motions to compel (1.30); communications re: pressing for meet and confer with adversary counsel in expedited fashion (.60); e-mail to adversary counsel - anytime/anywhere meet and confer (.30); Receipt and review order admitting MM PHV and communications re: same (.30); communications with BC re: big picture strategy (.60);
03/01/16	GWM	4.10	400.00	1,640.00	Communications with counsel for Bahnsen and review of discovery related matters - Dataflow analysis; 30(b)6 topics/issues;
03/02/16	GWM	4.10	400.00	1,640.00	Review realtors objections and responses to BS's 3rd NTP and Rogs (1.20); review of draft 30(b)(6) notice and e-mails re: same (.90); e-mails re: dataflow power point and review of same (.60); prep for meet and confer with defense counsel; (1.0); meet and confer call (.40);
03/02/16	GWM	3.40	400.00	1,360.00	Communications with counsel post-meet and confer re: outstanding discovery issues (.70); communications with SG counsel re: priv log issues (.70); e-mail from (AP predecessor counsel) re: previously missing correspondence and review of materials provided by AP on 3/2/16 (1.30); receipt and review draft letter to Wettre and communications re: same (.70);
03/03/16	GWM	0.40	400.00	160.00	Communications re: discovery disputes and letter to MJ Wettre;
03/03/16	GWM	0.50	400.00	200.00	Weekly telephone conference;
03/03/16	GWM	0.40	400.00	160.00	Communications re: narrowing of discovery issues in advance of letter to MJ Wettre;

03/04/16	GWM	6.20	400.00	2,480.00	Communications re: discovery dispute on production of physician's orders and proposed response to defendant's position of 3/3/16 (1.10); prep for letter to MJ Clark and communications with SG re: MJ Clark's preferences/protocols (.80); PHV orders/payment to Lawyers protection fund (.20); order from Court re: 3/16/16 deadline for letters on discovery disputes (.30); receipt and review transcript from hearing before MJ Wettre (.60); e-mails re: 30(b)(2) production and 30(b)(6) dep notice (.90); draft responses to rogs/ntp and communications re: same (.80); review and revise letter to MJ Clark (.90); e-mails re: Texas documents (.20); receipt and review Bahnsen 1-74 (.50);
03/07/16	GWM	6.20	400.00	2,480.00	Communications and document review;
03/08/16	GWM	1.60	400.00	640.00	Communications re: 30(b)(6) notice and with adversary counsel on variety of disc issues;
03/10/16	GWM	1.60	400.00	640.00	Musico email re: defendant's response to Request 11 (.10) e-mails among counsel for relator re: discovery issues PO's, Web Extender and 30(b)(6) deps.; review weekly task list;
03/11/16	GWM	1.30	400.00	520.00	Communications re: MM PHV and request to receive e-notifications (.20); filed request for MM to receive e-notifications (.30); receipt and review notice that MM added to list of counsel receiving e-notices (.10); email from LR re: database issue (.30); AS e-mail re: 30(b)(6) dep (.20); communications with BC re: status of letter to MJ Clark re: PO's (.20);
03/14/16	GWM	0.50	400.00	200.00	Communications with AS re: contact with MJ Clark (proposed) (.20); Receipt and review notice from Court re: 3/23/16 conference (.10); e-mail from MG re: search terms (.10); MM e-mail to L. Robinson re: deponents and dep. dates (.10);
03/15/16	GWM	0.40	400.00	160.00	E-mails re: disc disputes and in prep for 3/23/16 conference with MJ Clark;
03/16/16	GWM	0.40	400.00	160.00	Communications with defense counsel re: logistics of status letters;
03/16/16	GWM	2.90	400.00	1,160.00	E-mails re: discovery related issues in advance of 3/16 meet and confer deadline for status letter to MJ Clark (1.40); Receipt and review defendant's status letter to MJ Clark (.50); Receipt and review draft status letters and communications re: filing (1.0);
03/17/16	GWM	1.00	400.00	400.00	Communications with SG re: courtesy copy to Judge V. (.20); call to Judge V's chambers - directed to mail courtesy copy (.10); Receipt and review task list (.10); weekly conference call with SG (.50);
03/18/16	GWM	2.60	400.00	1,040.00	Communications re: variety of disc issues and attachments to e-mails;
03/21/16	GWM	4.60	400.00	1,840.00	30(b)6 caselaw and issues - communications re: same (1.10); expert witness info and communications (.90); e-mails and attachments re: Web Extender data for Physicians orders (1.60); e-mails re: BS billing protocols and procedures and attachments (.70); e-mails re: priv issues (.30);
03/22/16	GWM	4.30	400.00	1,720.00	E-mails; attachments re: experts; web extended and priv. log
03/23/16	GWM	6.90	400.00	2,760.00	Communications with SG re: SCS and attached materials (1.0); order from court adjourning 3/23 conference (.10); receipt and review e-mails and attachments re: priv log issues and potential motion to compel (4.40); e-mails re: deponents and documents associated with deponents/fact witnesses (1.40)
03/24/16	GWM	2.20	400.00	880.00	E-mails/attachments and analysis re; priv log issues and clawback arguments from Bos Sci
03/24/16	GWM	3.70	400.00	1,480.00	Analysis re: interloc appeal (.60); E-mails re: web extender data (1.60); e-mails re: consent to NR PHV (.20); E-mails/analysis re: 67 documents designated as invalid priv claims (.80); task list and weekly conf call (.50)
03/28/16	GWM	1.40	400.00	560.00	E-mails re: Relator deps in California (.10); e-mails re: results from Niordan as to claims data (.20); e-mails re: 3/28/16 letter to be filed with MJ Clark and exhibits (review of same) (.70); arrangements for filing and filing (.40);

03/28/16	GWM	0.90	400.00	360.00	E-mails re: Mark Underwood deposition (.20); E-mails re: defendants objections to current 30(b)(6) notice and alleged deficiencies associated with relators responses to request for written discovery and 3/28/16 F. Galant letter re: same (.50); e-mail from F. Galant re: defendant's priv log on claw back claims and underlying document (.20);
03/29/16	GWM	6.90	400.00	2,760.00	E-mails and attachments 3/25 - 3/29 re: issues associated with missing attachments from defendant's document production; potential experts for Medicare billing and damages; fact depositions; info from Noridian response to subpoena; draft letter and exhibits to defense counsel in terms of ongoing discovery disputes; questions/strategy re: obtaining pre-2007 claims data; order from Court re: 4/7 conference call and deadline for letter responding to defendants request for protective order on 30(b)(6) deps e-mails and proposed dep subpoenas;
03/30/16	GWM	6.60	400.00	2,640.00	Communications with SG and review of documents/issues as to subpoenas for non-party witnesses; productions; priv log issues; missing attachments; BS request for protective order and response to relator's request for order to compel;
03/31/16	GWM	6.80	400.00	2,720.00	E-mails, attachments and communications re: Noridian claim data results; expert disclosures; prep for response to defendant's position on priv log issues and weekly conference call;
04/01/16	GWM	5.90	400.00	2,360.00	E-mail re: Physicians orders as produced by BS and attached 3,865 PO's and analysis re: same; e-mails re: PO's range of dates service, metadata; e-mail from C. DaCosta and attachments re: Noridian production, BS clawback priv. log, BS supplemental priv log re: T.Shubert; e-mails re: Noridian's third production; Dep Notices for Gutierrez and Chavez; various other dep notice from C. DaCosta and scheduling of same;
04/01/16	GWM	1.70	400.00	680.00	E-mails re: Underwood subpoena, issues of timeliness re: Underwood dep subpoena; e-mail from F.R. re: discovery issues/conduct and draft response; communications re: upcoming conference with MJ;
04/04/16	GWM	6.20	400.00	2,480.00	Communications e-mails/calls re: ongoing discovery disputes and meet and confers; prep for 4/7 conference with MJ Clark; e-mails re: Underwood deposition; e-mails re: change (proposed) of 4/7 conference to in person; e-mails and docs re: retaliation claims; issues re: BSNC's accreditation status; Noridian claims analysis; dep notices and scheduling; 30(b)(6) dep issues;
04/05/16	GWM	3.90	400.00	1,560.00	E-mails/communications re: retaliation claims; revised drafts re: letter to MJ Clark responding to BSNC's request for protective order on 30(b)(6) topics; controversy re: documents with missing attachments; 26(a) disclosures re: expert discovery and draft response to same; arrangements for filing letter to MJ Clark and attachments; letter from F. Gallant to Court; 4/5/16 production letter from BSNC and documents;
04/06/16	GWM	3.80	400.00	1,520.00	Communications and document review re: various issues addressed in 4/5 e-mails and attachments;
04/07/16	GWM	4.70	400.00	1,880.00	Receipt and review e-mails/documents circulated among counsel re: Noridian production; missing claims data; Federal Tax ID searches; deposition prep (2.30); Plan and prep for conference call with MJ Clark on various discovery disputes (.80); Receipt and review notice from MJ Clark re: recusal (.10); communications with trial team re: recusal and next steps to address discovery issues with MJ Mannion ASAP (.90); weekly trial team conference call (.60); ;
04/08/16	GWM	4.60	400.00	1,840.00	Communications among counsel: Hernandez deposition; live stream access for upcoming deps; text order re: 4/25 conference; Clark's recusal; corp rep topics; clawback issues; efforts to get earlier date for conf with Mannion; Noridian subpoena and Noridian data;
04/11/16	GWM	2.10	400.00	840.00	Communications of 4/11 with SG team and review of attachments; Communications with Court re: earlier conference (1.90); with MJ Mannion (.20);
04/12/16	GWM	2.00	400.00	800.00	Daily communications; Defendant's dep notice for Underwood and conflict re: Estrada, W. Chau, docs for 30(b)(6) dep. of defendants re: fraud billing; Chau dep. topics; highlights from LaManna dep.; clawback issues;

04/13/16	GWM	1.10	400.00	440.00	E-mails re: moving conference with MJ Mannion to 4/21 (.30); e-mails re: priv. issues effecting deps (.20); receipt and review defendants priv. log for clawbacks from 4/12 dep (.20); letter and doc production 1241231-32 (.10); 12/7/09 BS letter to Palmetto and communications re: Palmetto letter (.30);
04/14/16	GWM	1.80	400.00	720.00	4/14 e-mails re: W. Chau Dep.; Palmetto Docs; moving hearing before MJ Mannion; N. Estrada dep.; BS clawbacks; dispute over relator's response to BS' 3rd set of rogs;
04/15/16	GWM	1.60	400.00	640.00	4/15 e-mails re: rog dispute, Verizon subpoena to J. Inter; Underwood dep.; spoliation issues; adverse inference; 4/21 hearing with MJ Mannion; draft of W. Chau dep transcript; draft of Estrada dep transcript; 30(b)6 admissions;
04/18/16	GWM	6.20	400.00	2,480.00	Communications re Hernandez depositions; Estrada deposition ongoing drafts of update letter to MJ Mannion; order moving telephone conference from 4/25 to 4/21; Dawn LaMana transcript and Wendy Chan Day 2 transcript; Verizon subpoenas; draft e-mail to defense counsel re: documents associated with "special project"; telephone conference re: clawback documents; e-mail re clawback documents; Gutierrez and Chavez rough transcripts; communications re: spousal privilege disputes as to rog responses;
04/19/16	GWM	4.40	400.00	1,760.00	E-mails and document review re: Estrada dep.; ongoing dispute as to missing attachments from BS document production; BSNC clawback claims; claims data from Noridian; draft response to submissions to MJ Mannion; La Manna rough dep. transcript; retaliation claims;
04/20/16	GWM	0.30	400.00	120.00	Communications re: joint letter to MJ Mannion and relators letter with sealed exhibits (.40); filed relator's letter to Mannion with sealed exhibits (.20);
04/21/16	GWM	2.00	400.00	800.00	Conference call with MJ Mannion and argument on variety of discovery disputes;
04/21/16	GWM	0.40	400.00	160.00	Post Conference debrief with Trial team;
04/22/16	GWM	0.90	400.00	360.00	JC e-mail re: current edition to joint letter to MJ Mannion and review of draft letter (.20); e-mail from RR re: release of unredacted "Cover Our Butts" e-mail and review of e-mail (.10); e-mails from SG team re release of COB e-mail (.10); e-mails re: dismissal of retaliation claims (.40);
04/25/16	GWM	3.80	400.00	1,520.00	Daily communications and review of e-mails and attached docs_____;
04/26/16	GWM	3.60	400.00	1,440.00	Daily communications and re: disc disputes; ongoing deps/dep transcripts;
04/28/16	GWM	2.60	400.00	1,040.00	Daily e-mails and communications with SG Team; Galant Cert.; clawbacks and conference call with SG;
04/29/16	GWM	2.00	400.00	800.00	Communications and document review from 4/29;
05/02/16	GWM	2.80	400.00	1,120.00	E-mails for 5/2/16 and attachments (1.50); prep for conference with court (.80); conference with court (.50);
05/03/16	GWM	3.60	400.00	1,440.00	5/3 e-mails and attachments; request for transcript from 5/2 hearing/opinion;
05/04/16	GWM	2.80	400.00	1,120.00	E-mails and attachments for 5/4/16; filing Joint letter and attachments under seal with MJ Mannion;
05/05/16	GWM	1.80	400.00	720.00	Weekly telephone conference and org of weeks materials;
05/10/16	GWM	2.90	400.00	1,160.00	Reviewed dep transcripts and limited video clips;
05/10/16	GWM	0.60	400.00	240.00	5/10 e-mails;
05/13/16	GWM	0.60	400.00	240.00	E-mails/communications for 5/13;
05/16/16	GWM	0.80	400.00	320.00	E-mails/filing for 5/16;
05/19/16	GWM	2.00	400.00	800.00	Communications re: deadlines/protocols for appeal of MJ Mannions 6/15 order on discovery issues (.50); e-mails re: errata as to 30(b)6 deps. (.10); e-mails re rescheduled conference call (.10) plan/prep for appeal of 5/16 order (1.30);
05/19/16	GWM	0.90	400.00	360.00	Receipt and review defendants amended R.26 disclosures;
05/24/16	GWM	0.60	400.00	240.00	E-mails and attachments re: new claims data;
05/25/16	GWM	1.60	400.00	640.00	E-mails and supporting materials re: remaining 30(b)6 deps;
05/26/16	GWM	1.20	400.00	480.00	Review daily comments and conference call;

05/27/16	GWM	2.20	400.00	880.00	Communications and review of draft appeal from MJ Mannions 5/2 oral decision and 5/16 order;
05/31/16	GWM	1.50	400.00	600.00	Receipt and review final draft of appeal of MJ Mannions discovery decision and filed same (.80); attended to filing appeal (.30); communications with SG counsel re: appeal (.40);
06/01/16	GWM	2.90	400.00	1,160.00	Comms for day and re: Appeal of Mannion's 5/16 Order; report re: Burns dep and review rough draft Burns dep trans.;
06/02/16	GWM	1.40	400.00	560.00	Comms for 6/2/16 and weekly status conf.;
06/06/16	GWM	3.80	400.00	1,520.00	Daily communications for 6/6/16 - transcript issues; settlement position paper drafts and arrangements for filing position paper and exhibits;
06/07/16	GWM	3.10	400.00	1,240.00	Review, revisions and communications re: settlement position paper to MJ Mannion;
06/08/16	GWM	1.60	400.00	640.00	Initial prep for settlement conference - facts and law;
06/09/16	GWM	3.10	400.00	1,240.00	Communications for 6/9/16; weekly status call; prep for 6/15 settlement conference and communications with Court and counsel re: 6/15 date;
06/13/16	GWM	4.20	400.00	1,680.00	Communications for 6/13; e-mails and attachments re: discovery dispute letter; settlement conf.; claims data; phys orders and diagnosis coding;
06/14/16	GWM	5.80	400.00	2,320.00	Rec/Rev/Edits joint letter to SCM on discovery dispute; exhibits; redaction; arrangements for filing under protective order; communications with counsel re: joint letter; comms with counsel and court re: 6/15 settlement conference and video presentation;
06/14/16	GWM	1.00	400.00	400.00	Prep for settlement conference;
06/15/16	GWM	6.20	400.00	2,480.00	Prep for and attendance at settlement conference before Judge Mannion;
06/16/16	GWM	4.20	400.00	1,680.00	Drafted motion to seal; communications re: motion to seal with SG and adversary counsel; communications re: mediation with SG and adversary counsel;
06/17/16	GWM	0.80	400.00	320.00	Comms for 6/17 on mediator issues; deadlines associated with motion to seal;
06/20/16	GWM	3.90	400.00	1,560.00	Calls/e-mails for 6/20/16's issues re: selection of mediator, entered order on motion to seal; Noridian discovery; background RS on mediators proffered by BS;
06/21/16	GWM	4.20	400.00	1,680.00	Communications for 6/21 among plaintiff's counsel re: mediation; supplemental discovery; receipt and review defendants application for additional time to respond to MJ appeal; review/analysis 301.1 re: 90 day stay vs. 30 day stay; research re: Hochberg, Wolin and Pisano backgrounds in false claims cases; comms with potential mediators re: availability;
06/22/16	GWM	3.70	400.00	1,480.00	Daily communications with SG team; communications with AW and FH as potential mediators; drafted proposed letter consenting to mediation;
06/23/16	GWM	6.20	400.00	2,480.00	6/23 and 6/24 - E-mails re: mediator selection; receipt and review draft expert report from Dr. Baer; receipt and review order extending BS time to respond to MJ appeal; drafts of letter to MJ Mannion re: consent to mediation;
06/23/16	GWM	2.30	400.00	920.00	E-mails re: Medicare applications and supporting materials;
07/05/16	GWM	5.60	400.00	2,240.00	Communications re: mediation in wake of Pisano appointment/scheduling only post September; reviewed mediation statement and recent damages discovery for revisions - aim to streamline/simplify;
07/06/16	GWM	0.80	400.00	320.00	Communications re: mediation;
07/07/16	GWM	2.70	400.00	1,080.00	Communications re: 7/8/16 call with mediator (Wolin) and prep for conference call with counsel and mediator;
07/08/16	GWM	2.90	400.00	1,160.00	Communications re: mediation; prep for mediation;

07/11/16	GWM	4.10	400.00	1,640.00	Communications with counsel at SG re: mediation (.60); Communications re: production re: Centers for Medicare and Medicaid Services and underlying documents (2.40); review current state of mediation statement and supporting materials (1.10);
07/12/16	GWM	2.30	400.00	920.00	Comms with counsel at SG and Mannion's chambers re: mediation (Wolin as mediator) (.60); review draft of mediation statement and damages documents (1.70);
07/14/16	GWM	3.30	400.00	1,320.00	Receipt and review order appointing Wolin as mediator (.10); communications re: Wolin appointment/retainer and mediation (.60); prep for mediation (2.60);
07/15/16	GWM	1.20	400.00	480.00	Communications re: mediation and prep for same;
07/18/16	GWM	4.30	400.00	1,720.00	Prep for mediation; communications with counsel and mediator re: mediation; delivered hard copies of mediation to Wolin;
07/19/16	GWM	4.60	400.00	1,840.00	Communications re: mediation and prep for mediation re: damages materials and dep trans review;
07/20/16	GWM	2.60	400.00	1,040.00	E-mails re: mediation and prep for same; translated damages expert info into common sense;
07/21/16	GWM	5.60	400.00	2,240.00	Comms re: expert deadlines (.40); reviewed docket re: deadlines (.40); prep for mediation (1.90); prep for post-mediation activities presuming mediation fails -application to reinstate discovery motions and alternative mechanisms to get a final pre-trial conference (2.80);
07/22/16	GWM	2.90	400.00	1,160.00	Communications and prep for mediation;
07/25/16	GWM	3.30	400.00	1,320.00	Mediation Prep;
07/26/16	GWM	7.00	400.00	2,800.00	Travel to/from mediation (1.20); attended mediation with Judge Wolin (3.60); post mediation conference with SG counsel (.40); post-mediation comms re: strategy re: expediting expert discovery, path to final pre-trial conference and trial date (.70); analysis re: arguments against defendant's ability to proceed on motion for SJ (1.10);
07/27/16	GWM	3.30	400.00	1,320.00	Communications re: expert discovery (.60); research/analysis re: achieving expedited trial date - bases for argument that dispositive motion practice would be futile and an exercise in delay/contrary to judicial resources/economy;
07/28/16	GWM	3.80	400.00	1,520.00	Post mediation analysis/to do list and analysis re: in limine motions, renewed appeal of MJ decision and discovery motion;
07/28/16	GWM	1.10	400.00	440.00	Communications with counsel re: expert deadlines;
07/29/16	GWM	3.40	400.00	1,360.00	Comms re: expert deadlines (.60); analysis re: streamlining case for trial/arguments re: no need for dispositive motions and mechanisms to get appeal of MJ decision and discovery motion adjudicated post-haste (2.80);
08/01/16	GWM	2.80	400.00	1,120.00	Communications re: discovery deadlines in wake of failed mediation and review of proposed disc. schedule; review of prior orders and current status of discovery/motion practice;
08/01/16	GWM	1.40	400.00	560.00	Ongoing analysis re: best approach to short-cut BS's anticipated maneuvering for SJ - too many questions of fact;
08/02/16	GWM	0.40	400.00	160.00	Comms re: Expert deadlines;
08/03/16	GWM	0.40	400.00	160.00	Communications re: reinstatement of MJ appeal and discovery motion;
08/04/16	GWM	1.60	400.00	640.00	Analysis/plan/prep for potential inactivity and push for adjudication of MJ appeal and/or discovery motion;
08/05/16	GWM	0.30	400.00	120.00	Comms with SG re: week of 8/8;
08/22/16	GWM	0.50	400.00	200.00	Communications re: deadlines for expert discovery;
08/23/16	GWM	1.60	400.00	640.00	Receipt and review latest draft of Baer report and communications re: same;
08/24/16	GWM	0.40	400.00	160.00	Communications with SG re: expert deadlines;

08/25/16	GWM	2.90	400.00	1,160.00	Communications with SG re: expert deadlines and review of draft expert reports and prep for potential conference call with Mannion re: deadlines in light of no decision on motion;
08/26/16	GWM	1.00	400.00	400.00	Receipt and review order from Mannion re 9/2 deadline for expert reports (.10); comms with SG re; 9/2 deadline (.90);
08/29/16	GWM	0.50	400.00	200.00	Communications re: deadlines for expert reports;
08/30/16	GWM	2.80	400.00	1,120.00	Communications with SG re: Expert deadlines and conference call with NR (.40); prep for call to FG at NR (.20); call to NR (.10); receipt and review order from Mannion (.10); communications with SG re: 9/2 deadline (.40); reviewed current expert reports (1.6);
08/31/16	GWM	1.10	400.00	440.00	Reviewed amended reports and comms re: same;
09/01/16	GWM	3.30	400.00	1,320.00	Communications re: expert reports and reviewed current drafts;
09/02/16	GWM	1.50	400.00	600.00	Communications with counsel and court re: extension of deadline for affirmative expert reports and reviewed current reports as drafts
09/06/16	GWM	1.60	400.00	640.00	Comms re: expert reports and review of same;
09/07/16	GWM	2.60	400.00	1,040.00	Ongoing review of JE Kemmerer report re: econ damages on BS counterclaims and supporting materials supporting same;
09/07/16	GWM	0.90	400.00	360.00	Review docket re: deadlines associated with 8/26/16 order from SCM and plan/prep for complying with same;
09/08/16	GWM	2.80	400.00	1,120.00	Plan prep for conference before MJ Mannion and review of submission in response to Court's inquiry as to relators know/of electronic data bases and counsel's attempts to obtain same;
09/09/16	GWM	2.00	400.00	800.00	Communications with SG re: status letter to Court, review re: various drafts of letter and filing of 9/9 letter (1.60); Receipt and review analysis of defendants status letter to Court (.40);
09/13/16	GWM	0.20	400.00	80.00	Comms re: to do tasks for week;
09/16/16	GWM	1.60	400.00	640.00	Receipt and review initial disclosures re: defendants experts and initial review re: same;
09/19/16	GWM	3.30	400.00	1,320.00	Background research re: Wayne van Halem; Timothy Deer and Greg Russo defendant's proffered experts;
09/20/16	GWM	1.60	400.00	640.00	Rec and review updated chrono/hot doc list;
09/21/16	GWM	2.30	400.00	920.00	Prep for conf with Judge Mannion - digested conflicting positions from BS re: existence of electronic databases and Blank Romes efforts to obtain records in question; submissions to court on issue and hot docs. summary;
09/22/16	GWM	0.20	400.00	80.00	Comms with MM re: 9/23 hearing;
09/23/16	GWM	7.40	400.00	2,960.00	Prep for conference before MJ Mannion on discovery issues; reviewed all materials filed re: electronic discovery dispute and e-mails with SG on issues (2.40); travel to from court for conference (1.40); pre conference meetings with counsel (.80); attended conference (1.50); post conference comms with SG and review of draft subpoenas/consent order (1.30);
09/26/16	GWM	5.40	400.00	2,160.00	Receipt and review amended scheduling order re: SC on 11/18 and deadlines for motions for SJ ; plan and prep for same - JMV opinions on SJ and SCM/JMV history re: applications to "prejudge" dispositive motions on consent; e-mails re: draft consent order and review of CO; review of draft subpoenas and attendant issues as to range of applicable years;
09/30/16	GWM	1.20	400.00	480.00	Calls/e-mails with SG and defense counsel re: proposed disc sched/consent order (.80); reviewed consent order (.20); filed proposed consent order (.20);
10/03/16	GWM	1.00	400.00	400.00	Background check into Medisoft and Zir Med in terms of connection to BS in prior cases;
10/04/16	GWM	0.40	400.00	160.00	Comms re: chrono scope of subpoenas (.20); Receipt and review entered consent order from SCM re: ongoing discovery issues and calendar same (.20);

10/04/16	GWM	2.20	400.00	880.00	Receipt and review BS's supplemental disclosures and background; Research re: van Halem; Deer, Russo & O'Shea and comms re: same;
10/10/16	GWM	0.20	400.00	80.00	E-mails re: subpoena to Zirmed/Medisoft;
10/12/16	GWM	0.20	400.00	80.00	Comms re: Medisoft data.
10/19/16	GWM	3.80	400.00	1,520.00	E-mail from JC re: BS flip flop on Medisoft data - reviewed Burns dep on topic and research re: MJ's decisions on similar issues potential spoliation/adverse inference charge; 30(b)6 responsibilities;
10/20/16	GWM	0.20	400.00	80.00	Communications with JC re: conference call and reviewed task list for call.
10/20/16	GWM	0.50	400.00	200.00	Reviewed task list and preparation for conference call.
10/20/16	GWM	0.40	400.00	160.00	Conference call re: short term/long term issues.
10/20/16	GWM	1.70	400.00	680.00	Analysis re: issues to be raised in potential motion for SJ.
10/21/16	GWM	0.80	400.00	320.00	Communications with SG team and analysis re: proposed depositions of BS's proffered exports.
10/24/16	GWM	3.10	400.00	1,240.00	Comms re: expert depositions and doc productions (.20); review of defendants expert reports re: potential Daubert applications and/or obvious omissions/contradictions (2.90).
10/25/16	GWM	1.60	400.00	640.00	Emails re; ZirMed supplemental production and initial review of ZirMed materials re: volume and baseline content.
10/27/16	GWM	0.60	400.00	240.00	E-mail from JC re task list for 11/27 conference call and prep for same (.40); conference call with SG (.20).
10/28/16	GWM	4.60	400.00	1,840.00	Communications re: issues to be discussed via 10/28 conference call; Zirmed data ongoing issues re: retrieving data; pros/cons of deposing defendant experts; upcoming status/settlement conference with SCM; propriety of speaking with W. Chan and prep for conf. call.
10/28/16	GWM	0.40	400.00	160.00	Comms with defense counsel.
11/01/16	GWM	2.00	400.00	800.00	Communications re: expert deps. and analysis re: ongoing dispute over Zirmed/Medsoft documents - options re: spoliation adverse inference.
11/03/16	GWM	0.50	400.00	200.00	Emails/comments re: Russo report.
11/04/16	GWM	1.10	400.00	440.00	Emails among counsel re: Expert dep schedules; defendants PHV application for S.A. Brinkman; Dep. Notice and subpoena for Dr. Rosenthal; conference call with SG team.
11/07/16	GWM	1.00	400.00	400.00	Emails re: Z. Smith PHV and supporting materials; order re: Z. Smith PHV application; order re: S. Brinkman PHV application.
11/07/16	GWM	0.50	400.00	200.00	Emails re: Baer dep.
11/08/16	GWM	1.00	400.00	400.00	Emails re: expert deps.; proposed letter to Court and Zirmed/Medsoft issues.
11/09/16	GWM	1.60	400.00	640.00	Receipt and review email/notice of dep for s. O'Shea; emails/communications re: Joint Agenda letter and drafts of same.
11/10/16	GWM	2.60	400.00	1,040.00	Communications with SG re: Joint Agenda letter and draft letter review; comms with Norton re: joint agenda letter and revisions re: same.
11/11/16	GWM	1.20	400.00	480.00	Emails re: response/objections to Rosenthal dep subpoena; joint agenda letter to SCM; Rosenthal dep summary; subpoena to Baer and Baer dep prep.
11/14/16	GWM	1.30	400.00	520.00	Emails re: deps and supplemental briefs (as attached); Wolin invoice; Baer report.
11/15/16	GWM	0.90	400.00	360.00	Emails re: dep issues; defendants revised position re: Zirmed/Medsoft issues.
11/16/16	GWM	0.30	400.00	120.00	Communications re: objections to Baer subpoena.
11/18/16	GWM	0.80	400.00	320.00	Attended S.C. before MJ Mannion (.40); Communications with SG re: SC (.40).
11/21/16	GWM	4.60	400.00	1,840.00	Review/analysis of O'Shea deposition and R. Baer transcript.
11/22/16	GWM	2.80	400.00	1,120.00	Comms re: potential contact with WC and cases/articles supporting contact with WC w/caveats (1.40); reviewed WC transcript for potential areas of contradiction (1.40);

11/23/16	GWM	0.30	400.00	120.00	Emails re: docs supporting Kemmer's testimony and Baer report.
11/28/16	GWM	4.50	400.00	1,800.00	Emails/communications re: Zirned production and initial review of materials produced to most recent request for Zirned data (1.20); emails re: BS' requests for Baer materials and analysis of same (1.30); initial analysis/prep for anticipated Daubert motion as to Dr. Baer and cross-application as to Deer (2.0).
11/30/16	GWM	5.20	400.00	2,080.00	Comms with SG; prep for conference call with SG; Conference call with SG re: Chan and Baer issues; prep for Daubert motions defense of Baer and motion against Deer; Russo dep prep issues; supplemental report from Russo; caselaw research re: NJ USDC decisions on Daubert in context of reliance on para work.
12/01/16	GWM	3.40	400.00	1,360.00	Comms with SG re: depositions and review of Russo supplemental report; prep for conference call; conference call with SG.
12/01/16	GWM	2.10	400.00	840.00	Review of JC's outline for Russo dep and emails re: status of counterclaims.
12/02/16	GWM	4.80	400.00	1,920.00	Emails re: Russo deposition; issues associated with same; outline of questions; Daubert Analysis; anticipated efforts NR may employ to rehabilitate Russo's testimony on direct (if any); emails re: draft stip of dismissal; letter from FG re designation of transcript of J. Kemmererces confidential; JC report re: Russo dep.
12/05/16	GWM	4.60	400.00	1,840.00	Comms re: G. Russo dep.; initial summary of Russo dep.; outlined possible Daubert issues; Vasquez treatment (limited volume) re: expert issues/limitations comms re: Baer review/supplemental report.
12/05/16	GWM	0.40	400.00	160.00	Comms re: W. Chan issues.
12/06/16	GWM	0.30	400.00	120.00	Communications re: Wolin Invoice;
12/08/16	GWM	4.20	400.00	1,680.00	Communications re: Deer deposition; comments re: same; MM's outline; receipt and review dep notice for Van Halem dep.; WVH dep outline and initial review of G.S. Russo dep.
12/09/16	GWM	3.80	400.00	1,520.00	Email from JC and review of Russo dep trans.; emails re: Van Halem dep and avoidance of impeachment (to be saved for trial); emails and dep notice for T. Deer dep.; emails re: Deer dep and outline for Deer; JC report re: summary of Van Halem dep.
12/12/16	GWM	2.20	400.00	880.00	Comms re: Deer dep. and Deer/Baer doc review; completed review of Van Halene dep. transcript.
12/20/16	GWM	0.20	400.00	80.00	Emails with Wolin confirming payment;
12/22/16	GWM	3.00	400.00	1,200.00	Comms with Counsel re: various issues.
12/22/16	GWM	0.60	400.00	240.00	Conference Call with Mag. Judge Mannion.
01/03/17	GWM	0.10	400.00	40.00	Notice from Court re: docket entry as to 12/22/16 telephone conference.
01/06/17	GWM	0.50	400.00	200.00	Comms re: upcoming motion deadlines.
01/09/17	GWM	1.10	400.00	440.00	Emails re: Van Hanlon deposition and errata sheet review of same.
01/13/17	GWM	0.60	400.00	240.00	Comms among counsel re: meet and confer issues.
01/16/17	GWM	0.30	400.00	120.00	Comms among counsel re: meet and confer issues.
01/17/17	GWM	0.40	400.00	160.00	Comms re: meet on confer.
01/18/17	GWM	0.40	400.00	160.00	Communications with counsel re: meet and confer issues.
01/19/17	GWM	0.60	400.00	240.00	Comms with counsel re: meet and confer issues on application to strike Baer report and draft letter re: same.
01/20/17	GWM	0.50	400.00	200.00	Comms re: dismissal stip and draft stip (.20); comms re: response to BS draft letter post meet and confer (.30).
01/23/17	GWM	2.40	400.00	960.00	Comms re: ongoing issues re: BS motion to strike Baer report; prep for meet and confer at 3:00 p.m.; meet and confer conference call with counsel.
01/24/17	GWM	0.30	400.00	120.00	Comms re: draft stip of dismissal.
01/25/17	GWM	0.50	400.00	200.00	Letter from FG to Court re: over length brief (.10); reviewed Vasquez' rules re: motion practice (.20); comms re: stip of dismissal (.20).
01/26/17	GWM	2.80	400.00	1,120.00	Comms re: motions to be filed 1/27/16 and review drafts of motion for SJ; Daubert and motion to seal and comms re: joint letter on motion to strike.

01/27/17	GWM	7.10	400.00	2,840.00	Communications with SG; receipt and review draft/final materials associated with MSJ; Daubert Motion and motion to seal; filed 3 motions; post filing comms with SG and adversary counsel; comms with SG and adversary counsel re: joint letter to court on defendants proposed motion to strike Baer report.
01/30/17	GWM	4.60	400.00	1,840.00	Initial review of Daubert brief and supporting materials from BS; initial review of BS motion for SJ and supporting materials; comms with SG and NR re: motions and issues attendant thereof.
01/31/17	GWM	2.30	400.00	920.00	Comms with SG/NR re: unredacted materials and review of motions.
02/01/17	GWM	3.30	400.00	1,320.00	Comms with counsel re: RR's request for consent to serve subpoena on PACER to determine who (if anyone) accessed materials NR inadvertently filed/without redaction and analysis of issue; communications/analysis of 7.1 extension on MSJ and consent for extension for Daubert briefs; comms re: Zirmed subpoena status; drafts of letters re: brief extensions; reviewed BS briefs on SJ and Daubert.
02/06/17	GWM	1.10	400.00	440.00	Comms re: briefing schedules.
02/07/17	GWM	1.20	400.00	480.00	Comms with FG and SG re: exchange of unredacted materials; comms re: overpayment to mediator; comms re: extension for opposition briefs.
02/08/17	GWM	1.10	400.00	440.00	Comms re: stip/letter to JMV for extra briefing time and filing letter/stip.
02/10/17	GWM	0.40	400.00	160.00	Comms re: status of JMV order as to amended briefing schedule.
02/13/17	GWM	0.20	400.00	80.00	Comms re: timing of SJ briefing and return date.
02/14/17	GWM	1.00	400.00	400.00	Comms re: letter to court re: overlength brief; drafts of same; filed letter; order granting over length brief.
02/16/17	GWM	2.00	400.00	800.00	Review of defendants MSJ and Daubert motion in prep for opposition due 2/24/17.
02/17/17	GWM	2.60	400.00	1,040.00	Comms and receipt and review draft opp on MSJ and Daubert; PACER subpoena.
02/20/17	GWM	0.40	400.00	160.00	Comms re: MSJ supporting aff's from relators; comms with US Attorney's office re: status.
02/21/17	GWM	0.80	400.00	320.00	Receipt and review drafts of opposition papers on Daubert motion and MSJ; comms re: draft briefs and supporting materials.
02/22/17	GWM	1.50	400.00	600.00	Comms with JC re: 56.1 statements/responses; research/analysis re: proper content for 56.1 and support for objections to improper opinion/argument.
02/23/17	GWM	2.80	400.00	1,120.00	Communications with JC, et als re: draft 56.1 response and review of drafts re: same (.50); analysis/comments as to standards associated with Local Rules on 56.1 statements (.90); comms re: optional supplemental statement of undisputed materials facts and reviewed initial draft of same (.70); emails/comms re: motion to seal and opposition to Daubert and logistics associated with all briefs to be filed on 2/24/17 (.60).
02/24/17	GWM	7.90	400.00	3,160.00	Review opp for MSJ, Daubert and motion to seal; comms with SG re: same and attended to filing opposition, supporting materials and motion to seal (6.80); comms with FG re: motion issues (.60); initial receipt and review of defendants opposition to MSJ; Daubert and motion to seal (.50).
02/27/17	GWM	1.00	400.00	400.00	Notices from Court re: deadlines associated with motions to seal - no argument (.10); comms with CD (SG) re: 2/24/17 filings, courtesy copies and cover letter to JMV (.50); comms re: issues with exhibits 14 and 33 and brief filed under seal (.40).
02/28/17	GWM	0.80	400.00	320.00	Comms with SG re: unredacted filings associated with defendants opposition (SJ and Daubert) from 2/24/17 (.40); BS comms re: initial analysis of defendants opposition to MSJ and Daubert motions (.40).
03/01/17	GWM	3.10	400.00	1,240.00	Ongoing review/analysis of BS briefs on SJ and Daubert; Comms re: reply briefs.
03/02/17	GWM	1.60	400.00	640.00	Communications with counsel and court re: Appendix V submissions - to be filed jointly at direction of court - omnibus motion will take place of joint motions to seal.
03/03/17	GWM	2.20	400.00	880.00	Comms with counsel and Court re: Appendix U issues on motions to seal and analysis of complying with Appendix U.

03/06/17	GWM	0.50	400.00	200.00	Comms with F. Galant re: exhibits from SJ motions and provided additional copies (.30); calls with FG re; Appendix U form and other potential exhibits associated with reply briefs (.20).
03/13/17	GWM	2.20	400.00	880.00	Comms with SG re: letter to JMV re: BS' potential request for overlength brief; Receipt and review draft reply on MSJ and comms re: same/daubert brief.
03/14/17	GWM	3.10	400.00	1,240.00	Letter from BS to Court requesting overlength brief; comms among counsel re: response to BS letter; drafts re: responding letter; arrangements/filing response letter; review draft reply briefs on SJ and Daubert.
03/15/17	GWM	3.00	400.00	1,200.00	Receipt and review 56.1 response on MSJ; comms with SG re: reply materials and reviewed drafts in progress; notices from court granting defendants request for overlength brief and Appendix V issues; received notice re: defendants filing 325-328 under seal and comms re: same.
03/16/17	GWM	5.60	400.00	2,240.00	Communications with SG re: reply briefs on Daubert and MSJ and supplemental 56.1 statement; review of drafts said materials and filed materials.
03/16/17	GWM	1.20	400.00	480.00	Notices re: Defendants filing under seal DEs 325-328; Comms with counsel re: nature of DEs 325-328 and request for same; comms with FG re: status of Appendix V tables and SCM's request for omnibus motion and withdrawal of prior joint motions to seal.
03/17/17	GWM	3.80	400.00	1,520.00	Comms with counsel re: ongoing requests for copies of materials defendants filed under seal on 3/16/17; emails with SG re: Colin Huntley affidavit; receipt and review materials filed by defendants on 3/16/17 under seal; emails re: defendants reply brief and analysis of reply brief itself in light of potential sur-reply brief.
03/21/17	GWM	0.40	400.00	160.00	Comms with NR and SG re: redacted materials and omnibus motion to seal.
03/22/17	GWM	0.50	400.00	200.00	Emails re: redactions/motion to seal.
03/23/17	GWM	2.00	400.00	800.00	Comms with SG re: letter to JMV and proposed sur-reply; reviewed drafts; confirmation from MM that JMV's chambers approved filing of proposed sur-reply with letter to JMV; revisions to letter and sur-reply and arrangements for filing.
03/24/17	GWM	2.80	400.00	1,120.00	Receipt and review defendant's 1st draft of omnibus motion and comms with counsel re: same - potential need for adjournment of 3/27/17 deadline.
03/27/17	GWM	5.40	400.00	2,160.00	Comms with SG re: omnibus motion to seal and review of our responses to defendant's 1st draft; comms re: FG re: omnibus motion to seal; investigated inquiry of materials filed under seal and drafted index of materials under seal in SJ/Daubert motions (moving, opposition and reply).
03/28/17	GWM	2.40	400.00	960.00	Receipt and review filed joint omnibus motion to seal and supporting materials; notice from court re: motion to be decided on the papers .
04/04/17	GWM	1.10	400.00	440.00	Receipt and review notice from JMV re: order granting request for sur-reply and comms with counsel re: same (.20); Receipt and review draft sur-reply and comms with SG re: same (.90);
04/06/17	GWM	2.80	400.00	1,120.00	Comms with MJ Mannion's law clerk and receipt/review of requested changes to Appendix U designations and refiling of exhibits; comms with counsel re: same.
04/07/17	GWM	1.80	400.00	720.00	Comm with counsel re: amendments to Appendix U; conference call with adversary counsel and review of materials to be filed publicly with redactions.
04/11/17	GWM	4.60	400.00	1,840.00	Receipt and review draft appendix U associated with joint motion to seal; comms with SG and work on revisions to joint motion appendix U; rec/rev/analysis re: BS initial filings in support of joint motion to seal.
04/12/17	GWM	6.90	400.00	2,760.00	Comms re: amended Exhibit U; prep and filing of Exhibit U.
04/27/17	GWM	0.20	400.00	80.00	Receipt and review notice re: 5/17 telephone conference with court and comms with SG re: same.
05/02/17	GWM	2.80	400.00	1,120.00	Receipt and review 5/2 order from SCM re: motion to seal; analysis of same; comms with SG and Norton re: problems/errors associated with SCM order; draft letter to SCM re: stay of 5/2 order and double checked exhibits for accuracy of position as to redacted exhibits.

05/03/17	GWM	1.60	400.00	640.00	Comms with FG and Court re: application to reseal; letter from FG to court re: re-sealing; analysis/prep for work associated with redacting materials filed underseal.
05/04/17	GWM	2.70	400.00	1,080.00	Order from Mannion re: temporary seal and 5/11 deadline to brief and redact exhibits; comms with FG and SG re: Mannion order; plan and prep for submissions to Court by 5/11.
05/09/17	GWM	1.00	400.00	400.00	Receipt and review Petratos 3rd Cir. Opinion and Kolchinski Statement of Interest.
05/10/17	GWM	2.20	400.00	880.00	Comms with FG re: joint brief and revised/redacted exhibits associated with Appendix U; review/analysis of same; comms with SG re: status of joint brief and revised/redacted exhibits and prep for filing of same.
05/11/17	GWM	2.90	400.00	1,160.00	Comms with FG and review of revised/redacted materials associated with motion to seal; filed redacted exhibits.
05/12/17	GWM	0.20	400.00	80.00	Receipt and review notice from SCM that 5/18/17 conf is adjourned; comms re: same with SG; order from SCM granting motion to seal.
07/28/17	GWM	0.40	400.00	160.00	Comms with AS re: status of motions
08/29/17	GWM	1.20	400.00	480.00	Review/analysis of Dzielak v. Whirlpool opinion on issue of Daubert exclusion under 703.
09/01/17	GWM	2.00	400.00	800.00	Reviewed docket for activity and recent Vazquez decisions re: indication of rate at which he is deciding dispositive motions; analysis re: steps deadlines in event an appeal is taken by either or both sides.
10/17/17	GWM	0.90	400.00	360.00	Comms with Judge Vazquez' Chambers requesting additional copies of motions for SJ/Daubert; Comms with SG re: Vazquez request and analysis of materials requested.
10/18/17	GWM	0.40	400.00	160.00	Comms re: courtesy copies to Vazquez.
12/15/17	GWM	2.50	400.00	1,000.00	Receipt and review JMV opinions/orders on Daubert motions and motions for SJ (2.0); comms with counsel for JMV opinions (.50).
12/18/17	GWM	0.70	400.00	280.00	Comms with AS re: press inquiries (.20); Receipt and review notice from court re: 1/9 settlement conf and comms with counsel re: same (.20); comms with MJ Mannion's chambers - SC on 1/9 is before JMV (.20); comms with counsel re: 1/9 conference with JMV (.10).
12/18/17	GWM	0.30	400.00	120.00	Email from FG re: alternative dates for SC and comms with counsel re: same.
12/19/17	GWM	0.60	400.00	240.00	Comms with trial team re: dates for settlement conference (.40); comms with FG re: settlement conf. (.20).
12/20/17	GWM	1.10	400.00	440.00	Comms among trial team re: settlement conference availability (.40); comms with FG re: settlement conference (.20); drafted/revised/filed letter to court re: 1/9/18 settlement conference (.20); Receipt and review FG letter to Court re: 1/18/18 as altern date for SC (.10); comms among trail team re: response to FG letter (.20).
12/21/17	GWM	0.40	400.00	160.00	Letter to Court re: avail for 1/18/18 (.20); notice from court sched 1/18/18 settlement conference (.10); email to trial team advising re: 1/18/18 settlement conference (.10).
12/21/17	GWM	0.10	400.00	40.00	Letter from FG re: 1/18 SC and email to trial team re: same and need for 12/22 letter.
12/22/17	GWM	0.40	400.00	160.00	Letter to JMV re: 1/18/18 conference (.20); Receipt and review notice from PACER re: GWM letter and advised trial team (.10); comms re: potential discussion with BS re: trial dates (.10).
01/17/18	GWM	0.10	400.00	40.00	Email to AS re: 1/18/18 SC before JMV.
01/18/18	GWM	3.70	400.00	1,480.00	Travel to/from USDC for settlement conference with JMV (1.20); pre-conf meetings with counsel and clients (.50); attended settlement conference before JMV (1.70); Receipt and review tax order re: letter to be provided by 2/2/18 advising as to potential settlement (.10); emails with counsel re: 2/2/18 letter (.20).
01/22/18	GWM	0.30	400.00	120.00	Comms re: request for W. Chan materials.
01/23/18	GWM	0.10	400.00	40.00	FR email objecting to production of Chan materials.
02/01/18	GWM	0.50	400.00	200.00	Receipt and review draft letter to JMV re: settlement position and emails re: same.

02/02/18	GWM	1.50	400.00	600.00	Comms among counsel re: drafts of letter to JMV reporting as to status of settlement; reviewed various drafts and attachments submitted letter to JMV via email.
02/05/18	GWM	0.80	400.00	320.00	Notice/email from USDC re: JMV's form of PTO and initial review of same (.40); comms with F Gallant re: JMV PTO (.20); email to trial team re: circumstances re: receipt of JMV's PTO (.20).
02/07/18	GWM	0.30	400.00	120.00	Comms with MM re: pre-trial order issues.
02/13/18	GWM	0.20	400.00	80.00	Comms with AS re: status of PTC.
02/14/18	GWM	0.50	400.00	200.00	Comms re: status of PTC and analysis re: means to accomplish.
02/20/18	GWM	0.20	400.00	80.00	Comms re: status of Pre-Trial Conference.
02/21/18	GWM	0.50	400.00	200.00	Comms re: PTC w/SCM.
02/21/18	GWM	0.40	400.00	160.00	Emails re: BSNC's proposal for narrowing damages issues.
02/22/18	GWM	2.80	400.00	1,120.00	Receipt and review order from SCM re: PTC on 4/30/18 and instructions re: same; comms with plaintiff team re: PTC and initial prep for drafting PTO.
02/23/18	GWM	2.40	400.00	960.00	Reviewed long form and short for PTO templates from JMV; diaried appropriate dates/deadlines; review prior voir dire, jury instructions, jury, interrogatories and neutral statement of case and initial prep re: same.
02/27/18	GWM	1.00	400.00	400.00	Comms with FG re: discrepancies between Clark Form PTO and Mannion Form PTO; reviewed both forms and comms with SG re same.
03/01/18	GWM	0.50	400.00	200.00	Comms with FG and AS re: discrepancies with PTO.
03/01/18	GWM	1.50	400.00	600.00	Comms with NJ counsel re: JMV PTOs and trial procedure.
03/02/18	GWM	1.30	400.00	520.00	Comms with counsel re: PTO discrepancies and 3/5 call to court and prep for same.
03/05/18	GWM	2.90	400.00	1,160.00	Comms with counsel re: BS proposal as to claim definition and analysis re: same; prep for call to Mannion's chambers; comms re: WC issue; call to Mannion's chambers.
03/07/18	GWM	1.20	400.00	480.00	Comms with MM, AS and MG re: letter to SCM and reviewed draft letter to SCM and revisions to same (1.0); comms with FG re: SCM letter (.20).
03/08/18	GWM	0.10	400.00	40.00	Receipt and review FG email and revised letter to SCM (.20); email from AS re: WC issue (.10).
03/09/18	GWM	0.40	400.00	160.00	Comms with counsel and arrangements for filing joint letter with SCM.
03/19/18	GWM	0.20	400.00	80.00	Email from MG and draft letter to SCM re: WC issue.
03/20/18	GWM	2.40	400.00	960.00	Receipt and review order from SCM re: correction to pre-trial order and comms with counsel re: same (.20); review current PTO and doc/dep review re: prep of PTO input to SG and pre-trial motion analysis (2.20).
03/20/18	GWM	0.20	400.00	80.00	Comms with adversary counsel re: WC as witness.
03/23/18	GWM	1.00	400.00	400.00	Emails re: WC agreement and analysis of our position - firm ground.
03/26/18	GWM	1.50	400.00	600.00	Email exchanges re: dep designations and prep for advice on NJ practices as to use of dep designations at trial.
03/28/18	GWM	1.80	400.00	720.00	Review PTO and prep for PTC and questions re: form of order and conference (1.0); comms re: Dep designations; WC status - represented by NR (.80).
04/02/18	GWM	1.50	400.00	600.00	MM emails re: proposed trial exhibits and review of same.
04/03/18	GWM	2.50	400.00	1,000.00	Comms re: exhibit list and review of docket/CMO's re: deadline for exhibit list (.40); prep for PTO - stipulated facts and in limine issues (2.10).
04/04/18	GWM	1.80	400.00	720.00	Comms with FG and MM re: status of exhibits list for PTO and review of status of PTO deadlines and drafts in hand.
04/05/18	GWM	1.80	400.00	720.00	Comms with counsel re: trial exhibits and dep designations; Receipt and review initial dep. designations.
04/06/18	GWM	1.80	400.00	720.00	Comms re: exhibit list and accessed stickered exhibit database.

04/09/18	GWM	3.20	400.00	1,280.00	Comms re: trial exhibits and review of prior PTOs re: handling/compliance with dep designations, exhibits, in limine motions, etc.
04/10/18	GWM	2.00	400.00	800.00	Comms among counsel re: discrepancies as to exhibit lists and prep for meet and confer.
04/11/18	GWM	2.10	400.00	840.00	Comms with counsel on issue of use of dep designations at trial and review of GWM prior PTO's and current state of affairs in DNJ re: reliance on dep designations.
04/13/18	GWM	3.30	400.00	1,320.00	Prep for 4/20 meet and confer on PTO and 4/16 conference call - in limine issues; review of exhibit lists (both sides) for potential reductions.
04/16/18	GWM	3.10	400.00	1,240.00	Prep for conference call with adversary counsel re: Pre-trial order (.80); conference call with adversary counsel re: pre-trial order disputes (.50); research analysis re: excessive exhibit lists; dep designations and identification of webextender data base as a single exhibit (1.80).
04/16/18	GWM	2.10	400.00	840.00	Receipt and review (initial) of relators' dep designations.
04/17/18	GWM	3.20	400.00	1,280.00	Ongoing review of dep designations and exhibit lists overall form of PTO - compliance with Local Rules.
04/18/18	GWM	3.60	400.00	1,440.00	Reviewed current draft of pre-trial order and prep for pre-trial meet and confer on 4/20.
04/19/18	GWM	3.00	400.00	1,200.00	Prep for meet and confer on PTO - review of current PTO and list of issues to be addressed.
04/20/18	GWM	5.60	400.00	2,240.00	Travel to/from S.G. for FPTO meet and confer (3.8); pre and post meetings with AS, MG and MM (.80); meet and confer with SG and NR (1.0).
04/23/18	GWM	2.80	400.00	1,120.00	Receipt and review BS section of pre-trial order and summary of documents BS intends to use at trial for webextender (2.60); comms re: exhibits and exhibit lists (.20).
04/24/18	GWM	1.20	400.00	480.00	Ongoing review of BS section of PTO and designated docs from Webextender.
04/25/18	GWM	4.10	400.00	1,640.00	Comms re: draft Pretrial order and review/analysis of current draft and consideration of MILs and BS' anticipated reaction/arguments against dep designations.
04/26/18	GWM	3.60	400.00	1,440.00	Comms with SG re: exhibits to PTO and PTO itself; prep exhibits; comms with all counsel re: defendants section of PTO; review defendants PTO sections and exhibits and analysis of same.
04/27/18	GWM	4.20	400.00	1,680.00	Pretrial order and exhibits review and filing; comms with counsel re: PTO.
04/30/18	GWM	5.50	400.00	2,200.00	Comms with MJ Mannion's chambers re: hard copies of PTO to be hand delivered; arrangements for 2 copies of PTO and exhibits for SCM; travel to/from USDC DNJ; presented SCM with PTO and exhibits; review PTO and prep for FPTC; attended FPTC and conferences with counsel for SG re: same.
04/30/18	GWM	0.10	400.00	40.00	Text order from SCM re: 4/30 FPTC and forwarded to SG.
05/01/18	GWM	0.40	400.00	160.00	Notice from clerk re: 4/30 PTC and comms with FG/SG re: same.
05/02/18	GWM	2.40	400.00	960.00	Comms with counsel re: conference call with SCM re: DE 407, prep for 5/3/18 conference call with SCM; email with list of relators contemplated motions in limine and analysis of same.
05/03/18	GWM	2.90	400.00	1,160.00	Comms with FG and MM re: call to Mannion's chambers re: discrepancy in text order; prep for call to Mannion's chambers re: text order discrepancy; post call comms with FG and MM; notice from clerk correcting text order re: date for next status conference and comms to SG re: same; email from Z.S. re: BS objections to relators exhibits and reviewed chart re: same.
05/07/18	GWM	2.10	400.00	840.00	Comms among counsel re: reduction of exhibits and objections to exhibits and review of current exhibit lists and objections.
05/08/18	GWM	2.20	400.00	880.00	Review initial PTO and analysis re: areas to reduce exhibits and/or witnesses.
05/09/18	GWM	2.60	400.00	1,040.00	Comms re: objections to exhibits and prep for call re: same (1.0); reviewed dep designations and ongoing research re: NJ treatment of dep designations at trial (1.60).
05/10/18	GWM	1.00	400.00	400.00	Comms re: call with adversary counsel and prep for meet and confer.
05/11/18	GWM	0.80	400.00	320.00	Emails/comms re: meet and confer on 5/14 and prep for same.

05/14/18	GWM	1.70	400.00	680.00	Reviewed notes from F PTC and emails re: revisions to PTO in prep for meet and confer (.80); participated in meet and confer telephone conference (.80); email from MM summarizing meet and confer (.10).
05/15/18	GWM	1.50	400.00	600.00	Reviewed current PTO for areas that could be reduced.
05/16/18	GWM	1.00	400.00	400.00	Review PTO for revisions/deletions, review transcript from PTC before SCM.
05/18/18	GWM	1.40	400.00	560.00	Comms re: joint dispute letter (.40); Receipt and review transcript from 4/30 hearing before SCM (1.0).
05/21/18	GWM	0.60	400.00	240.00	Comms with MM and FG re joint dispute letter and ongoing issues with PTO; reviewed BS's revised exhibit list as per FG's 5/21/email.
05/22/18	GWM	2.20	400.00	880.00	Email from FG (.10); BS section of joint dispute letter (.30); BS current exhibit list and analysis of same as compared to prior exhibit list (1.20); comms with SG and NR re: joint dispute letter and exhibits (.60).
05/23/18	GWM	2.90	400.00	1,160.00	Comms among counsel re: drafts of joint letter, Amended PTO and exhibits to PTO; review of various drafts and filing joint letter, PTO and exhibits A-1 to PTO.
05/24/18	GWM	1.40	400.00	560.00	Review/analysis of joint letter and amended PTO as filed in prep for follow-up SCM conference.
05/24/18	GWM	0.30	400.00	120.00	Comms with SG re: 5/23 filings.
05/30/18	GWM	0.20	400.00	80.00	Comms re: S. Brinkman to Reed Smith.
05/31/18	GWM	1.60	400.00	640.00	Reviewed BS current position on PTO and prep for next FPTC.
06/05/18	GWM	0.20	400.00	80.00	Comms re: 6/6 conference call with SCM.
06/06/18	GWM	3.70	400.00	1,480.00	Prep for conference all with SCM on revised PTO; reviewed initial, and consent PTO and transcript from PTC #1 (2.0); participated in telephonic PTC (.60); reviewed SCM and JMV treatments of PTOs with high level document load - no findings re: sanctions where documents identified but not used at trial (1.10).
06/08/18	GWM	1.60	400.00	640.00	Text order re: meet and confer re: revised PTO; claim material motions and exhibit/dep desig issues and prep for MC review existing PTO.
06/12/18	GWM	0.60	400.00	240.00	Comms with counsel re: dates/deadlines associated with in limine motions.
06/13/18	GWM	1.80	400.00	720.00	Prep for telephone conference with all counsel re: Motions in limine and amended PTO (.80); call with all counsel re: MILs and PTO (.80); call with MM post-meet and confer re: proposed deadlines (.20);
06/14/18	GWM	0.20	400.00	80.00	Receipt and review proposed sched for MILs from counsel for BS.
06/19/18	GWM	1.10	400.00	440.00	Comms with counsel re: MIL Sched and letter to Court; Plan prep for revised PTO and upcoming meet and confer conference call.
06/20/18	GWM	2.00	400.00	800.00	Comms re: meet and confer on 6/21 and review of draft PTOs and emails from 5/18 - present re: PTO issues.
06/21/18	GWM	1.50	400.00	600.00	Prep for conference call on amended PTO and MIL's; conference call with counsel.
06/22/18	GWM	2.30	400.00	920.00	Comms (emails and calls) among counsel re: 6/22 submission to SCM re: PTO and motions in limine and various versions of revised PTO and joint letter.
07/02/18	GWM	2.30	400.00	920.00	Mail/email and filings from week of 6/25-6/29.
07/03/18	GWM	0.30	400.00	120.00	Comms re: PHV counsel addition (SB).
07/05/18	GWM	1.60	400.00	640.00	Reviewed docket and calls re: JMV trial schedule for Fall/Winter 2018-19.
07/06/18	GWM	2.80	400.00	1,120.00	Receipt and review BS motion in limine and supporting materials.
07/09/18	GWM	2.00	400.00	800.00	Review of BS MIL and supporting materials and analysis re: opposition and moving papers for Relator's MIL.
07/17/18	GWM	1.40	400.00	560.00	Comms re: meet and confer and prep for same and review of status on MILs - BS brief and due date for relators opp and moving MIL.
07/19/18	GWM	1.00	400.00	400.00	Review of BS MIL; plan prep deadlines/scope/length of opposition.
07/20/18	GWM	1.30	400.00	520.00	Emails and draft of opp to BS MIL re: universe of claims.
07/24/18	GWM	2.10	400.00	840.00	Comms from adversary counsel re: intention to file MIL to strike relators exhibit list and dep designations; basis for same and analysis of BS' positions comms with MM re: same.

07/25/18	GWM	0.90	400.00	360.00	Meet and confer with counsel re: MIL issues; exhibit list and dep designations (.60); post call comms with MM (.30).
07/26/18	GWM	1.00	400.00	400.00	Plan/prep for filing opp to MIL reviewed current materials and comms with counsel.
07/27/18	GWM	2.90	400.00	1,160.00	Emails re: follow-up to meet and confer (.20); Receipt and review updated draft re: opposition to MIL (1.30); comms re: revisions to MIL and filing (.40); prep and filing MIL opposition (.80); post filing comms with counsel (.20).
07/30/18	GWM	2.00	400.00	800.00	Reviewed MIL brief package and prep for Round 2 of MILs to be filed by 8/10/18 and trial issues to be conceded/modified (logistics - dep designations and exhibits).
08/13/18	GWM	2.60	400.00	1,040.00	Receipt and review BS reply on their in limine motion (.60); comms with MM re: issues with DE 421 (.10); Receipt and review file in limine motion (relators) and supporting materials (1.60); email to SCM/JV re: PDF searchable version of DE 421 (.30).
08/16/18	GWM	0.50	400.00	200.00	Receipt and review NOA by J. Eppensteiner and email to SG re: same (.10) letter to Judge V. re: Doc. entry 421 (.40).
08/17/18	GWM	2.00	400.00	800.00	Receipt and review signed Final pre-trial; notes/analysis re: deadlines/logistics associated with FPTO and comms with SG.
08/24/18	GWM	2.00	400.00	800.00	Review docket for events the week of 8/27 settlement conference and reply briefs and prep for same.
08/28/18	GWM	1.70	400.00	680.00	Comms re: adjournment of 8/31/18 settlement conference to proceed to mediation (.20); Comms re: potential redaction of exhibits associated with Relators reply brief on MIL (.20); review of BS opposition to Relators MIL in prep for filing reply (1.30).
08/29/18	GWM	1.50	400.00	600.00	Comms re: potential redactions to exhibits associated with opposition to BS MIL and review of exhibits in question (.90); comms re: potential adjournment of 8/31 conf with SCM and BS desire to go forward with conference (.60).
08/30/18	GWM	2.70	400.00	1,080.00	Comms with SG; Receipt and review opposition to BS MIL; filed opposition.
08/31/18	GWM	2.50	400.00	1,000.00	Conference call with counsel and SCM (.40); Receipt and review BS opposition to Bahnsen MIL and supporting materials.
09/04/18	GWM	1.80	400.00	720.00	Ongoing review/analysis of BS opposition to inlimine motion.
09/25/18	GWM	2.80	400.00	1,120.00	Receipt and review JMV 9/24/18 opinion and order re: BS motion in limine granted in part/denied in part (1.0); comms with counsel re: effect of JMV decision and analysis re: additional briefing on missing CMS 1500 forms (1.80).
09/26/18	GWM	2.00	400.00	800.00	Analysis/research re: extra pollution and/or statistical sampling as treated in USDC DNJ.
09/27/18	GWM	1.40	400.00	560.00	Reviewed 9/24 JMV opinion and compared to final pre-trial order re: scope of damages.
10/02/18	GWM	1.10	400.00	440.00	Plan/prep for upcoming briefing deadlines and review docket as to pending issues and potential trial date.
10/04/18	GWM	2.00	400.00	800.00	Receipt and review draft brief as to proposed handling of damages in light of plaintiff's refusal to turn over underlying claim forms and comms re: same.
10/05/18	GWM	2.30	400.00	920.00	Comms with SG re: supplemental brief and filing of same (.60); Receipt and review drafts of supplemental brief on calculating damages (1.10); attended to filing brief, MG Decl. and exhibits (.50); email to adversary counsel providing courtesy copy of supp brief (.10).
10/12/18	GWM	0.50	400.00	200.00	Comms re: letter to JMV requesting trial date and filing of letter to JMV.
10/12/18	GWM	0.90	400.00	360.00	Receipt and review BSNC brief re: damages calculations and exhibits.
10/15/18	GWM	0.80	400.00	320.00	Reviewed BSNC's brief re: calculation of damages.
10/15/18	GWM	0.50	400.00	200.00	Comms with counsel re: BS MTS - consent granted
10/16/18	GWM	0.60	400.00	240.00	Reviewed BS filing underseal on opposition to brief on damages and reviewed local rules for compliance.

10/17/18	GWM	2.80	400.00	1,120.00	Comms with MG and review of draft reply brief on damages; arrangements for filing reply brief; analysis/prep for filing redacted materials on 10/18/18; email to adversary counsel re: materials filed under seal.
10/18/18	GWM	1.30	400.00	520.00	Comms with counsel for BS and receipt and review declaration of M. Geist re: MTS (.20); comms with SG re: MG declaration (.10); comms with SG re: need for redactions to exhibits 2 & 3 from MG declaration and inquiry as to grounds for sealing exhibit 1-recommending exhibit 1 be filed publicly (.50); arrangements/filing exhibits under seal. (.40).
10/19/18	GWM	1.30	400.00	520.00	Refiling Gerva's Certification and comms with counsel re: same (.50); Receipt and review notice re: 5/6/19 trial and comms with counsel (.20); reviewed FPTO for deadlines associated with trial date for JCHGS; Voir Dire, etc. (.60).
10/26/18	GWM	1.00	400.00	400.00	Receipt and review defendants motion to seal and comms with MG re: deadline for Relator's corresponding motion to seal.
10/29/18	GWM	0.10	400.00	40.00	Comms with MM re: MTS.
10/30/18	GWM	2.10	400.00	840.00	Comms with MM re: MTS; Receipt and review draft motion to seal; revisions to MTS and drafted Appendix U (1.80); comms with adversary counsel confirming Exhibit 1 to MG Cert under seal and no objections to Exhibits 2 and 3 remaining under seal (.30).
10/31/18	GWM	1.30	400.00	520.00	Revisions to Motion to Seal and filing of MTS (1.0); call from SCM's chambers confirming Exhibit 1 is not under seal (.10); confirmation re: motion to seal (.20).
11/06/18	GWM	0.20	400.00	80.00	Comms with MG re: change of address.
11/09/18	GWM	0.70	400.00	280.00	Comms with SG team re: motion to seal and notice to change MG address; filed notice re: MG address.
11/13/18	GWM	0.20	400.00	80.00	Comms re: mediation 2/22/19.
11/14/18	GWM	0.30	400.00	120.00	Comms re: 2/22 mediation.
11/29/18	GWM	0.30	400.00	120.00	Receipt and review orders from SCM on motions to seal Relator's granted/defendants denied; forwarded to counsel at SG.
12/10/18	GWM	0.20	400.00	80.00	Receipt and review notice from USDC re: defendants revised motion to seal and comms with SG re: same.
01/10/19	GWM	0.20	400.00	80.00	Receipt and review JMV order granting defendants motion to seal and comms with SG re: same.
01/18/19	GWM	0.20	400.00	80.00	Receipt and review 1/18/19 order from JMV and email to SG team re: same and calendar 3/25/19 for appearance before JMV.
01/25/19	GWM	1.00	400.00	400.00	Receipt and review relator's mediation statement and comms with counsel SG and RS re: mediation.
02/07/19	GWM	0.20	400.00	80.00	Communications re: exchange of mediation statements.
02/08/19	GWM	0.20	400.00	80.00	Comms re: Mediation.
02/11/19	GWM	2.80	400.00	1,120.00	Comms among counsel re: reply mediation statements (.40); Review/analysis of defendants reply mediation statement (1.30); Review and analysis of relators rely mediation statement (1.10).
02/26/19	GWM	0.60	400.00	240.00	Comms with SG re: fees/expenses and provided hard copy back up re: same.
03/07/19	GWM	2.10	400.00	840.00	Reviewed in limine motions/opposition and briefs re: forming basis of a claim in prep for 3/25/17 hearing before Judge Vazquez.
03/12/19	GWM	0.10	400.00	40.00	Receipt and review order granting NR request to withdraw.
03/25/19	GWM	1.40	400.00	560.00	Preparation for motion hearing re: in limine motions and claim definition motion.
03/25/19	GWM	1.20	400.00	480.00	Travel to/from USDC for hearing.
03/25/19	GWM	0.40	400.00	160.00	Pre-hearing conference with WC MG, MM & AS.
03/25/19	GWM	3.40	400.00	1,360.00	Attended motion hearings before Judge Vazquez.
03/26/19	GWM	0.10	400.00	40.00	Notice from Court re: Docket Entry for 3/25/19.
03/28/19	GWM	1.10	400.00	440.00	Receipt and review transcript from hearing before JMV on 3/25/2019.

03/28/19	GWM	0.30	400.00	120.00	Receipt and review orders from JMV re: M/Ls and claim issue.
03/28/19	GWM	0.30	400.00	120.00	Communications with SG re: JMV orders.
08/10/18	KST	0.70	150.00	105.00	Review and analyze motions in limine to be filed.
08/10/18	KST	0.20	150.00	30.00	Telephone call with M. Musico re: procedural edits to motions in limine.
08/10/18	KST	0.20	150.00	30.00	Another telephone call with M. Musico re: procedural edits to motions in limine.
08/10/18	KST	0.20	150.00	30.00	Review and analyze revised documents re: procedural edits added.
08/10/18	KST	0.20	150.00	30.00	Draft Notice of Appearance for KST.
08/10/18	KST	1.10	150.00	165.00	Prepare and file motions in limine.
Total Hours & Fees		<u>1,010.10</u>		<u>403,390.00</u>	

	<u>Hours</u>	<u>Fees</u>
GWM	1,007.50	403,000.00
KST	2.60	390.00
Total Hours	<u>1,010.10</u>	<u>403,390.00</u>